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May 31, 2024

VIA ECF

The Honorable Maryellen Noreika  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, DE 19801

**Re: *United States v. Robert Hunter Biden, Criminal Action No. 23-61-MN***

Dear Judge Noreika:

This firm represents a coalition of local and national news media organizations (the “Press Coalition”)<sup>1</sup> that have reported on the above-captioned prosecution of Robert Hunter Biden, son of President Joseph R. Biden, Jr. Attached please find the Press Coalition’s Motion for Contemporaneous Access to Trial Exhibits in this matter, along with a Proposed Order.

The Press Coalition respectfully requests that the Court address its motion on an expedited basis before opening statements at trial, or at the earliest date possible while the trial is ongoing. Absent expedited review, the Press Coalition’s requested relief of same-day release of trial exhibits to the press and public will not be timely addressed.

Respectfully submitted,

*/s/ Beth Moskow-Schnoll*

Beth Moskow-Schnoll (# 2900)  
Lauren P. Russell (# 6576)

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<sup>1</sup> The coalition includes American Broadcasting Companies, Inc. d/b/a ABC News, the Associated Press, Cable News Network, Inc., CBS Broadcasting Inc. o/b/o CBS News, Dow Jones & Company, Inc., publisher of The Wall Street Journal, Gannett Co., Inc., the ultimate parent company of The News Journal and DelawareOnline.com, National Public Radio, Inc., NBCUniversal Media, LLC d/b/a NBCUniversal News Group, The New York Times Company, POLITICO LLC, and WP Company LLC d/b/a The Washington Post.